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REMARKS

The Examiner has rejected all of the pending claims based on six references, namely Suzuki, Hancox, Forish, Harris, Crotzer and Longueville. Although the Examiner acknowledges that none of the cited references specifically teach a conductive layer that is 1-4 microns thick, the Examiner states that it would have been obvious to one having ordinary skill in the art as of the time the invention was made to specify a workable range of the conductive layer on the substrate, suggesting that such optimum or workable ranges involves only routine skill in the art. The Applicants submit, however, that a conductive layer of this thickness would not be obvious, or a mere "optimum value" of a "result effective variable" or "workable range" based on any of these references.

To help explain the Applicants' position, and to provide some information from a person having substantial skill in the applicable art, Applicants have submitted the Declaration of Todd Nykerk, one of the co-inventors. Moreover, believing that some confusion may have been caused by the reference in the claims to a "substrate," Applicants have also amended the claims to remove that language. Instead, the amended claims make clear that the conductive layer is deposited directly on the lamp housing. In order to narrow the issues, Applicants have also canceled claims 31-34 that the Examiner argued added new matter, and added a new claim 35, which calls for the method to make a conductive layer 1 to 4 microns thick.

As the Nykerk declaration makes clear, a conductive layer of 1-4 microns is not a mere optimum or workable range within the references cited by the Examiner. To the contrary, all of the references either teach away from an electrical circuit with a McDonnell Boehnen Hulbert & Berghoff LLP 300 South Wacker Drive Chicago, Illinois 60606 (312) 913-0001

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conductive layer of that thickness or teach the need for some sort of intermediate carrier

of nonconductive material to support the conductive layer. None of the references teach

or suggest a conductive layer for one or more electrical circuits deposited directly on said

lamp housing, the conductive layer is 1 to 4 microns thick. Nor do any of the claims

teach any methods for direct metallization of a lamp housing to form electrical circuits as

called for by the method claims.

Although Applicants also take issue with several of the bases for rejection of the

dependent claims (e.g., Hancox. Forish and Harris clearly do not teach a conductive layer

that is directly embedded in the substrate as only contact points are even arguably

attached to the substrate), Applicants believe that the independent claims are so clearly

patentable over the cited art that additional argument regarding the dependent claims is

unnecessary at this time.

Thus, Applicants submit that the pending claims are patentable over the prior art.

Counsel for the Applicants believes that a telephone interview may be appropriate to

discuss these issues, and requests that the Examiner contact the undersigned at 312-913-

2121 at his convenience.

Respectfully submitted,

McDonnell Boehnen Hulbert & Berghoff

Date: March 16, 2004

By:

McDonnell Boehnen Hulbert & Berghoff LLP 300 South Wacker Drive Chicago, Illinois 60606

(312) 913-0001